



July 3, 2017

**BY ECF**

Hon. Allyne R. Ross  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **United States v. Michael Guidici, et al.**  
**Criminal Docket No.: 17 Cr. 00127 (ARR)**

Dear Judge Ross:

I represent Defendant Michael Guidici in the above-referenced matter. I write on behalf of Defendant Michael Guidici to respectfully request a brief extension of time for the Defendant to file scheduled motions in advance of trial on Counts Three and Four of the above-referenced case, which is scheduled to begin on August 21, 2017.

At the June 30, 2017 status conference, the Court ordered the Defendant to file scheduled motions on July 5, 2017, with responses due on July 10, 2017, and a hearing on July 20, 2017. To permit the parties to negotiate and finalize a plea agreement, the Defendant respectfully requests that this briefing schedule be extended such that the motions for Defendant be due on July 13, 2017, responses due on July 17, 2017, and the scheduled hearing can remain on July 20, 2017. The government consents to this request.

The parties have agreed in principle to a potential plea agreement and are trying to finalize language as such, however due to scheduling conflict and vacation plans, the parties are trying to determine an appropriate date for a plea before the Court sometime immediately after July 13, 2017.

Respectfully submitted,

**/s/ Vincent J. Ancona**

Vincent J. Ancona, Esq.  
*Counsel for the Defendant*  
*Michael Guidici*

cc: Clerk of the Court (ARR) (by ECF)  
Counsel of record via ECF